



Decision _____

FILED
10-13-16
10:41 AM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Gas Company (U904G) and San Diego Gas & Electric Company (U902G) to Proceed with Phase 2 of their Pipeline Safety Enhancement Plan and Establish Memorandum Accounts to Record Phase 2 Costs.	Application No. 15-06-013 (Filed June 17, 2015)
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**INTERVENOR COMPENSATION CLAIM
OF THE UTILITY REFORM NETWORK AND
DECISION ON INTERVENOR COMPENSATION CLAIM
OF THE UTILITY REFORM NETWORK**

Intervenor: The Utility Reform Network	For contribution to Decision (D.) 16-08-003
Claimed: \$ 61,080.91	Awarded: \$
Assigned Commissioner: Michel Picker	Assigned ALJ: Maribeth Bushey
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/
Date: 10/13/16	Printed Name: Robert Finkelstein

PART I: PROCEDURAL ISSUES (to be completed by Intervenor except where indicated)

A. Brief description of Decision:	The application of Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) sought authorization to establish memorandum accounts to record approximately \$22 million in planning and engineering design costs associated with Phase 2 projects of the utilities' Pipeline Safety Enhancement Plan (PSEP). An ALJ ruling issued early in the proceeding addressed the need to develop a comprehensive procedural plan to address PSEP costs. In D.16-08-003, the Commission approved the requested memorandum accounts, and adopted a procedural approach for ongoing review of the utilities' PSEP costs.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	8/4/15	
2. Other specified date for NOI:		
3. Date NOI filed:	9/3/15	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.14-05-001 CMRS ROW Rulemaking	
6. Date of ALJ ruling:	9/5/14	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001 CMRS ROW Rulemaking	
10. Date of ALJ ruling:	9/5/14	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-08-003	
14. Date of issuance of Final Order or Decision:	8/19/16	
15. File date of compensation request:	10/13/16	
16. Was the request for compensation timely?		

C. Additional Comments on Part I (use line reference # as appropriate):

#	Intervenor’s Comment(s)	CPUC Discussion
	On 10/15/15, TURN’s Board of Directors adopted amendments to TURN’s bylaws and articles of incorporation. The amended version of TURN’s by-laws and articles of incorporation were submitted on January 6, 2016 in A.15-09-001 (PG&E 2017 GRC). The by-laws and articles of	

	incorporation have not changed since their submission in that proceeding.	
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PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Intervenor except where indicated)

- A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. Establishment of Phase 2 Memorandum Accounts: The Sempra Utilities proposed to establish a new memorandum account for recording initial costs associated with Phase 2 PSEP projects. The utilities also sought permission to create memo accounts during the pendency of the proceeding, and sought to have the ultimate memorandum accounts effective as of the date of the application. TURN's protest indicated that the request for a memorandum account was likely to be relatively non-controversial (assuming certain clarifications from the utilities), but challenged the request for a retroactive effective date. TURN also challenged the utilities' request for immediate establishment of memorandum accounts, as such relief would effectively pre-determine the outcome on the core issues raised by the application.</p> <p>The Commission did not grant the utilities' request for immediate memorandum accounts. And in D.16-08-003, the Commission specified that the Phase 2 memorandum accounts approved therein were effective as of the date of the decision, rather than the date of the application.</p>	<p>TURN Protest (7/20/15), pp. 3-4.</p> <p>TURN Response to Motion To Immediately Establish Memorandum Accounts (7/2/15).</p> <p>D.16-08-003, Ordering Paragraph 1.</p>	
<p>2. Number of and Schedule for Upcoming PSEP Project Cost Reviews: Early in the proceeding it became clear that there was a need for a comprehensive procedural plan to address PSEP costs. In particular, the procedural path contemplated by the utilities' application was one of numerous future applications to be filed at unspecified times, without the clear objective of achieving incorporation of PSEP-related work into future general rate cases (GRCs) for the Sempra Utilities. The assigned ALJ directed the parties to</p>	<p>ALJ's Ruling Directing Parties to Meet and Confer and Setting Prehearing Conference (7/24/15), pp. 3-4.</p>	

<p>engage in meet and confer efforts with the goal of developing a comprehensive procedural plan for addressing PSEP costs.</p> <p>TURN was an active participant in the meet and confer process, and played an instrumental role in the development and presentation of the joint positions of TURN, ORA, SCGC and IS. The Joint Proposal for “Glide Path” to 2019 GRC, originally submitted informally on 10/30/15, the attached to the Joint Intervenor Response of 11/9/15, provided for two reasonableness review applications for remaining Phase 1A projects, and forecast applications (either separately filed or as part of future GRCs) for other PSEP projects. This was in contrast to the annual reasonableness review filings embodied in the Sempra Utilities’ proposal.</p> <p>The Commission adopted the Final Energy Division Staff Proposal, which adopted the Joint Intervenor’s proposal to limit reasonableness reviews to two applications. It also adopted the Joint Intervenor’s approach of having a forecast application for Phase 2 projects, and to fold all remaining PSEP-related spending into future GRCs, for review on a forecast basis (with possible review of 2018 capital costs on an after-the fact basis).</p>	<p>Joint Intervenor Response to SEU Proposal (11/9/15), including Attachment 1.</p> <p>D.16-08-003, p. 11 and Attachment A</p>	
<p>3. Interim Cost Recovery: The Sempra Utilities filed a petition for modification in A.11-11-002 that sought to revise D.14-06-007 to permit interim rate recovery of PSEP costs, subject to refund. In D.15-12-020, the Commission transferred the related issues to this proceeding. The Sempra Utilities renewed their request here, seeking authorization for interim rate recovery of 100% of recorded amounts, but stating that 90% recovery would be “workable.”</p> <p>TURN and the other intervenors did not include any interim recovery in their procedural proposal, and argued that the utilities’ arguments in support of 90-100% recovery were overstated.</p> <p>In a ruling issued December 2, 2015, the ALJ presented a proposed filing schedule prepared by the Energy Division that would, among other things, provide for interim rate recovery of 50% of recorded amounts. The Sempra Utilities filed comments seeking recovery of at least 70% of the recorded amounts. TURN and the other intervenors opposed</p>	<p>D.16-08-003, pp. 3, 8-9.</p> <p>Joint Intervenor Response to SEU Proposal (11/9/15), pp. 6-12 and Attachment 1.</p> <p>Reply Comments of IS, ORA, SCGC</p>	

the proposed increase from 50% to 70%, arguing that the utilities had not justified the need for anything greater than the 50% included in the Energy Division proposal. In D.16-08-003, the Commission maintained the interim rate recovery at the 50% level originally recommended by Energy Division.	and TURN (1/22/16), pp. 3-5. D.16-08-003, pp. 9-10, FOF 4, and COL 2.	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: TURN's position on the procedural framework for review of the reasonableness of PSEP-related spending was shared with ORA, Southern California Generation Coalition (SCGC) and Indicated Shippers (IS).		
d. Intervenor's claim of non-duplication: TURN's efforts reflect a remarkable level of coordination and cooperation among the non-utility parties. Nearly all of the pleadings and other submissions regarding the appropriate procedural framework for reviewing PSEP-related spending were submitted jointly by TURN, ORA, SCGC and IS. As the attached time sheets make clear, these same parties devoted substantial time and effort to coordination of their work and presentations in the proceeding. TURN played a very prominent role in these efforts, often undertaking the initial drafting of joint pleadings and making initial proposals regarding strategic decisions and other matters for the parties' consideration. The Commission should find that TURN's participation was efficiently coordinated with the participation of ORA, SCGC and IS wherever possible, so as to avoid undue duplication and to ensure that whenever duplication occurred, it served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.		

C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Intervenor's Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness:	CPUC Discussion
<p>TURN's request for intervenor compensation seeks an award of approximately \$61,000 as the reasonable cost of our participation in the proceeding. In light of the scope and quality of TURN's work, and the benefits achieved through TURN's participation in the proceeding, the Commission should have little trouble concluding that the amount requested is reasonable.</p> <p>The utilities application had proposed memorandum account treatment for approximately \$22 million of planning and initial engineering costs for Phase 2 PSEP projects. This element of the application turned out to be relatively non-controversial. Most of the parties' and staff's efforts addressed questions regarding the number and timing of upcoming PSEP cost review proceedings, and the utilities' request for interim rate recovery of all or nearly all of the recorded balance in PSEP-related balancing accounts. TURN, working closely with ORA, SCGC and IS, convinced the Commission to adopt a general approach to upcoming PSEP cost reviews that achieved a reasonable balance between the need to move forward with PSEP-related work and the ability to ensure the reasonableness of the associated costs recovered from ratepayers. Furthermore, TURN's efforts with the other intervenors are evident in the Commission's adopting a 50% interim rate recovery approach for completed PSEP projects that had not yet been the subject of reasonableness review, a far cry below the 90-100% originally sought by the utilities. As a result, the initial request for interim rate recovery for SoCalGas sought a total revenue requirement of \$86 million over a sixteen-month amortization period, rather than \$172 million. (SCG AL 5017-A, August 31, 2016)</p> <p>TURN submits that the near-term savings to ratepayers from the reduced amount of interim rate recovery is a substantial benefit that is many multiples greater than the \$60,000 of intervenor compensation sought here. Harder to quantify but perhaps more important are the benefits of developing a process for presentation and review of PSEP-related costs that will rely on fewer reasonableness reviews and increase the amount of projects and associated costs that are reviewed on a forecast rather than after-the fact basis. However, TURN urges the Commission to recognize that these outcomes were some of the most important in this proceeding, and are likely to provide substantial benefits, albeit benefits that may be hard to quantify in dollars.</p> <p>In sum, the Commission should conclude that TURN's overall request is reasonable in light of the benefits to Sempra Utility ratepayers that were</p>	

attributable in part to TURN's participation in the case.	
<p>b. Reasonableness of hours claimed:</p> <p>TURN's attorneys recorded a very reasonable number of hours for their work in this matter. Robert Finkelstein and Thomas Long each had primary responsibility at various times during the proceeding, with Mr. Long taking the lead in the first few months after the application was filed, followed by Mr. Finkelstein assuming that role for the duration of the proceeding (with Mr. Long stepping back into the lead in late 2015 during a period when Mr. Finkelstein was unavailable). The time records supporting this request for compensation demonstrate that TURN had a single representative at each event associated with the proceeding, and Mr. Long and Mr. Finkelstein had a limited number of internal consultations associated with developing TURN's strategy or similar activities.</p> <p>The total hours included in this request for compensation (just under 120 hours) is the equivalent of approximately three weeks of full time work for a single attorney. TURN submits that this is a very reasonable amount, given the range of issues that ended up being the subject of D.16-08-003, and the time-intensive nature of the ongoing meet and confer and settlement process the parties undertook in an attempt to achieve a mutually acceptable procedural approach. While that effort was ultimately unsuccessful, it did permit a narrowing of the issues that permitted Energy Division to develop a middle-ground position for further review and refinement and, ultimately, adoption in D.16-08-003.</p> <p>TURN has also included here 3.0 hours Mr. Finkelstein recorded in late 2014 for work on interim cost recovery issues that the Sempra Utilities raised in a petition for modification of D.14-06-007 (the initial PSEP decision for these utilities). In D.15-12-020, the Commission transferred all such interim cost recovery issues from A.11-11-002 to this proceeding. Therefore, TURN omitted those hours from its request for compensation for work leading up to D.15-12-020, and instead has included them here.</p> <p>Finally, TURN has also included here 10.0 hours Mr. Finkelstein recorded for work on the review of and responding to the advice letters each utility submitted to implement D.16-08-003. The effort focused mainly on the inter-class allocation of PSEP costs as presented in the advice letters.</p> <p><u>Compensation Request Preparation Time:</u> TURN is requesting compensation for 9.5 hours devoted to compensation-related matters, of which 9.0 hours is for preparation of this request for compensation. Mr. Finkelstein prepared this request for compensation because his role as lead attorney for TURN for the majority of this proceeding enabled him to prepare the request in a far more efficient manner than if it were prepared by a TURN attorney less familiar with the proceeding and TURN's work therein.</p> <p>TURN submits that the recorded hours are reasonable. Therefore, TURN seeks compensation for all of the hours recorded by our attorneys that are included in this request.</p>	

c. Allocation of hours by issue:

TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to general activities that are part of nearly all CPUC proceedings, such as tasks associated with general participation, procedural matters, and coordination with other parties, as well as the specific substantive issue and activity areas addressed by TURN in this proceeding.

Code	Stands for:
GP	General Participation -- work that is essential to TURN's participation but would not vary with the number of issues that TURN addresses, for the most part. This code appears most regularly during early stages of proceeding, and covers tasks such as the initial review of the application and testimony, participation in the prehearing conference, and other similar tasks that are of a more general nature.
Coord	Coordination with other parties -- meetings, e-mails and phone calls, with ORA, SCGC and IS here, about strategies, joint efforts and pleadings
MA	Memorandum Account -- issues associated with request to establish Phase 2 memorandum account, request for interim account, and effective date for account
Sched	Scheduling for upcoming reasonableness reviews and forecast presentations on PSEP-related projects. (Because much of this work was performed in conjunction with the cost recovery issues covered in the next category, many of the hours are coded Sched/CR.)
CR	Cost recovery for completed but not-yet reviewed PSEP-related projects. (Because much of this work was performed in conjunction with the cost recovery issues covered in the previous category, many of the hours are coded Sched/CR.)
PFM	Petition for Modification filed by SoCalGas and SDG&E in A.11-11-002 on 10/10/14, seeking similar interim rate recovery of PSEP balances. In D.15-12-020, the Commission determined that A.15-06-013 is the appropriate proceeding for addressing such interim rate recovery issues, and transferred all such issues to this proceeding. D.15-12-020, FOF 8, COL 12
Sett	Settlement -- efforts related to settlement discussions among parties as utilities and customer representatives worked (ultimately unsuccessfully here) to develop a mutually agreeable schedule and interim cost recovery for upcoming PSEP review proceedings.
PD	Proposed Decision -- work on reviewing, analyzing, commenting on, and strategizing on the Proposed Decision and revisions thereto.
AL	Advice Letters for implementation of D.16-08-003 -- TURN filed protests to SCG AL 5017-A and SDG&E AL 2506-G-A, regarding the proposed inter-class allocation of PSEP costs.
Comp	Time devoted to compensation-related pleadings

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Robert Finkelstein	2014	3.0	\$505	D.15-08-023	\$1,515.00			
R. Finkelstein	2015	42.25	\$505	D.15-08-023 (for 2014 – 2015 COLA of 0%)	\$21,336.25			
R. Finkelstein	2016	45.0	\$510	2015 Rate, with 1.28% COLA per Res. ALJ-329	\$22,950.00			
Thomas Long	2015	22.5	\$570	D.15-06-021 (for 2014; 2015 COLA of 0%)	\$12,825.00			
Subtotal: \$ 58,626.25						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
T. Long	2015	0.5	\$285.00	½ of approved 2014 rate	\$142.50			
R. Finkelstein	2016	9	\$255.00	½ of requested 2016 rate	\$2,295.00			
Subtotal: \$2,437.50						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
	Photocopying	Copies made of TURN pleadings for service, and, where applicable, copying charges from consultant billings			\$6.70			
	Telephone	Charges for long distance or conference calls associated with this proceeding			\$1.89			
	Postage	Expenses for postage for this proceeding			\$8.57			
Subtotal: \$17.16						Subtotal: \$		
TOTAL REQUEST: \$ 61,080.91						TOTAL AWARD: \$		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and</p>								

any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ¹	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Robert Finkelstein	June 1990	146391	No
Thomas Long	December 1986	124776	No

C. Attachments Documenting Specific Claim and Comments on Part III (Intervenor completes; attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Attorney Time Sheet Detail
3	Expense Detail
4	Allocation by Issue Table
Comment 1	<p>2014, 2015 and 2016 Hourly Rates for TURN Representatives</p> <p>For 2014 and 2015 hours, TURN has used the hourly rates already approved for work performed in 2014 by TURN's attorneys. This approach is generally consistent with the Commission's decision in Resolution ALJ-308 to not adopt a cost of living adjustment for 2015 for intervenor compensation purposes.</p> <p>For 2016 hours, TURN is requesting a rate increase consistent with the Commission's decision in Resolution ALJ-329 to adopt a cost of living adjustment of 1.28% for 2016 for intervenor compensation purposes. The rate requested represents the 2014-authorized rate increased by 1.28%, then rounded to the nearest \$5.</p>
Comment 2	Expenses – TURN has included the reasonable expenses for photocopying, telephone charges, and postage associated exclusively with our participation in this proceeding.

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	Reason

¹ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (*see* § 1804(c))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.
2. The requested hourly rates for Intervenor's representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Intervenor is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of Intervenor’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

Attachment 1

Certificate of Service

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

Attachment 2

Attorney Time Sheet Detail

Date	Atty	Case	Task	Description	Hours	Time Spent
9/19/2016						Page 1
2:00 PM						
Attorney: BE						
10/10/14	BF	A15-06-013	PFM	Initial review of Sempra PFM seeking interim cost recovery		0.25
10/10/14	BF	A15-06-013	PFM	Rev and analyze Sempra PTM re rate recovery		0.25
10/13/14	BF	A15-06-013	PFM	p/c w/ NPedersen re: PFM, recent Sempra numbers recorded and reported in monthly reports		0.50
11/7/14	BF	A15-06-013	PFM	Review NPedersen draft of response to PFM on rate recovery; draft e-mail to NPedersen re: same; review and respond to revised version		1.50
11/10/14	BF	A15-06-013	PFM	Final review and edit of jt response of TURN and SCGC		0.50
6/18/15	BF	A15-06-013	GP	Initial review of Sempra App for Phase 2 engring costs, motion for memo acct		0.75
9/1/15	BF	A15-06-013	GP	Discuss PSEP Ph 2 issues, strategy w/ TLong		0.25
9/16/15	BF	A15-06-013	Sched	P/c w/ TLong re: status of issues regarding presentation and review of PSEP-related applications, strategies for next week's all-party meeting with ED		0.50
9/21/15	BF	A15-06-013	Sched	P/c w/ NPedersen re: prep for all-party and ED call tomorrow, strategies; draft e-mail to ORA and IS re: potential strategies		1.00
9/22/15	BF	A15-06-013	Sched	E-mail exchange w/ ORA re: conf call strategy; prep for and participate in conf call w/ SEU, intervenors, and RMyers for ED		2.00
9/23/15	BF	A15-06-013	Sched	p/c w/ TLong re: yesterday's conf call, next steps, strategies		0.25
9/28/15	BF	A15-06-013	Sched	Review SEU e-mail re: proposed confidential treatment of scenarios; draft e-mail to TLong re: proposed response		0.50
9/30/15	BF	A15-06-013	Sched	Discuss procedural scenarios, alternative approaches w/ TLong; review CPSD report from 2012, other materials re: approaches to Phase 1B projects; e-mail to Tlong and NPedersen re: same		1.50
10/1/15	BF	A15-06-013	Sched	Prep for call w/ all parties; p/c w/ NPedersen re: strategies; participate in cal w/ all parties; discuss w/ TURN attys and mgmt re: options for partial cost recovery as part of potential schedule relief		2.00
10/2/15	BF	A15-06-013	Sched	Prep for call; follow-up call with ORA, SCGC and IS about next steps on developing proposed approach for ALJ's consideration		1.00
10/6/15	BF	A15-06-013	Sched/CR	E-mails re: jt proposal of intervenors; draft alternative version of jt proposal; e-mail exchange re: modifications to jt proposal to SEU; conf call w/ other intervenors re: jt proposal		1.50
10/7/15	BF	A15-06-013	Sched/CR	Conf call w/ SEU and other intervenors; draft e-mail to other intervenors re: reaction to call, potential next steps		1.75
10/8/15	BF	A15-06-013	Sched/CR	P/cs w/ DGruen re: ORA mngmt review, next steps		0.50

Date	9/19/2016 Atty 2:00 PM	Case	Task	Description	Hours	Time Spent
						Page 2
10/15/15	BF	A15-06-013	CR	E-mail to NPedersen re: SEU claims on need for cost recovery; p/c w/ NPedersen re: negotiating strategy, next steps; draft long e-mail to TLong re: same		1.50
10/22/15	BF	A15-06-013	Sett	Meeting with SEU and other intervenors re: negotiations on proposal to ALJ		3.25
10/26/15	BF	A15-06-013	Sched	Review NPedersen write-up of position, draft e-mail re: same; p/c w/ NPedersen re: TURN position; draft e-mail to ORA/SCGC/IS re: new approach, next steps		1.50
10/27/15	BF	A15-06-013	Sett	Meet w/ ORA, SCGC re: next steps; draft e-mails to SEU and to Energy Division re: status, next steps		1.25
10/28/15	BF	A15-06-013	Sched	Draft and edit intervenor proposal to ALJ for further PSEP proceedings; draft cover e-mail to other intervenors; p/c w/ NPedersen re: original draft; prepare and circulate revised draft		2.25
10/30/15	BF	A15-06-013	Sched	E-mail exchanges w/ other intervenors re: next steps with delivery to ALJ; draft e-mail to TLong re: strategy going forward		1.00
11/5/15	BF	A15-06-013	Sched/CR	Review SEU proposal; draft rough outline of potential response cmmts; draft cover e-mail to other intervenors; call w/ intervenors re: coordinating cmmts		3.00
11/6/15	BF	A15-06-013	Sched/CR	Initial draft of first three sections of cmmts; draft cover e-mail to other intervenors		3.75
11/7/15	BF	A15-06-013	Sched/CR	Draft jt intervenr cmmts in response to SEU proposal		5.00
11/8/15	BF	A15-06-013	Sched/CR	Finish initial draft of comments, draft cover e-mail to intervenors; draft e-mail re: pre-1946 pipe issue for purposes of comments		2.50
11/9/15	BF	A15-06-013	Sched/CR	P/c w/ other intervenors re: cmmts on SEU proposal; revise and edit based on input from other intervenors, final prep of cmmts		3.50
12/5/15	BF	A15-06-013	Sched/CR	Draft e-mail to TLong re: strategy for all-party meeting next week		0.25
1/4/16	BF	A15-06-013	Sched/CR	Review ALJ Ruling, ED proposal; draft e-mail with strategy prospects;p/c w/ NPedersen re: same; e-mail to ED for clarification of proposal;		1.50
1/5/16	BF	A15-06-013	Sched/CR	Review ORA draft comments; p/c w/ intervenors re: joint comments draft e-mail to NSkinner re: ORA draft arguments; draft jt cmmts for TURN/SCGC/IS, cover e-mail to NPedersen an dKMorsony		5.25
1/14/16	BF	A15-06-013	Sched/CR	Review Sempra comments on ED proposal, other file materials; p/c w/ ORA, SCGC and IS re: strategy for reply cmmts		1.50
1/21/16	BF	A15-06-013	Sched/CR	Review NPedersen draft of reply comments; edit; draft additional materials		2.00

Date	9/19/2016 Atty 2:00 PM	Case	Task	Description	Hours	Time Spent
						Page 3
1/29/16	BF	A15-06-013	Sched	Review SEU reply cmmts; draft e-mail to other intervenors re: concerns w/ new 1B proposal		1.00
2/2/16	BF	A15-06-013	Sched	Draft e-mail to ORA, intervenors re: next steps, strategy		0.50
2/9/16	BF	A15-06-013	Sched/CR	P/c w/ NPedersen re: SEU reaction to offer to discuss, next steps		0.50
2/10/16	BF	A15-06-013	Sched	Draft motion for response to SEU new Ph 2B proposal in reply		5.25
2/11/16	BF	A15-06-013	Sched	Finish initial draft, draft cover e-mail to other interveors; conf call w/ intervenors; revise motion consistent w/ intervenor input		3.50
3/7/16	BF	A15-06-013	Sched	P/c w/ ALJ Bushey; draft e-mail to intervenors re: same		0.50
3/11/16	BF	A15-06-013	Sched	Draft 3d round pleading based on ALJ Ruling; draft cover e-mail to other intervenors		4.00
3/14/16	BF	A15-06-013	Sched	Final reviews and edits to 3d rd pleading on Ph 2B		0.75
4/5/16	BF	A15-06-013	Sched/CR	E-mail exchange w/ TLong re: Scoping Ruling, adopted procedural approach, potential for cost recovery to be addressed in scoping ruling		0.50
4/6/16	BF	A15-06-013	Sched/CR	E-mail to intervenors re: AL for AC memo acct, potential issues, basis for protest		0.75
4/6/16	BF	A15-06-013	CR	E-mail exchange w/ ORA re: impact of ED proposal on scoping memo re: 50% of balance rather than 50% of annual spending; p/c w/ NPedersen re: same		0.75
5/8/16	BF	A15-06-013	GP	Review SEU filing in response to scoping memo re: deferrals tied to AC		0.50
5/9/16	BF	A15-06-013	GP	Participate in SEU presentation on response		0.50
7/9/16	BF	A15-06-013	PD	E-mail exchange w/ NPedersen, then all parties re: PD assertion on comment waiver		0.50
7/11/16	BF	A15-06-013	PD	Follow-up on whether any party intends to file comments on PD		0.25
7/22/16	BF	A15-06-013	PD	E-mail exchange w/ NPedersen re: potential comments on PD		0.25
8/8/16	BF	A15-06-013	PD	Review SEU opening comments on PD; draft e-mail to NPedersen and DGruen re: need for reply comments, strategies		0.75
8/11/16	BF	A15-06-013	PD	Draft reply comments; e-mail to other intervenors re: same		2.50
8/12/16	BF	A15-06-013	PD	Review ORA edits; e-mail exchange about proposed edits, further revisions; further work on document		1.25
8/16/16	BF	A15-06-013	PD	Review revised PD; draft e-mail to ORA and SCGC re: same		0.25
	BF	A15-06-013	AL	E-mail exchange w/ ORA re: SEU implementation ALs; draft e-mail to SEU re: explanation of calculations for allocation of PSEP costs used in ALs		
9/2/16						0.75

Date	Atty	Case	Task	Description	Hours	Time Spent
9/19/2016	BF	A15-06-013	AL	Review response to questions about allocation of Bal Acct amounts in advice letter; draft analysis and cover e-mail to BMarcus		1
9/8/16						
9/9/16	BF	A15-06-013	AL	Draft follow-up questions about inter-class allocations in Advice Letters		1
	BF	A15-06-013	AL	Review SEU response to second set of questions on allocation; research TCAP proceeding SEU testimony and decisions to establish existing cost allocation method		2.25
9/12/16						
	BF	A15-06-013	AL	Draft e-mail to ORA re: AL treatment of cost allocation, questions about past treatment in TCAPs; proposed protest challenging allocation		0.75
9/13/16						
	BF	A15-06-013	AL	Draft and do calcs for SoCalGas protest on cost allocation; revise and do calcs for SDG&E protest		2
9/19/16						
	BF	A15-06-013	AL	Draft and edit protests to ALs for implementation of rates to challenge allocation		2.25
9/20/16						
9/23/16	BF	A15-06-013	Comp	Review case files, records for comp request preparation		1.50
9/30/16	BF	A15-06-013	Comp	Initial drafting of comp request		1.75
10/8/16	BF	A15-06-013	Comp	Further review of case files, further drafting		2.25
10/9/16	BF	A15-06-013	Comp	Draft comp request		3.50
Total: BF						99.25

Attorney: TL

6/18/15	TL	A15-06-013	GP	Initial overview of application		0.50
6/30/15	TL	A15-06-013	GP	Rev and analyze application and memo account motion		0.75
6/30/15	TL	A15-06-013	GP	Discuss application and motion w/ N. Pederson (SCGC)		0.25
6/30/15	TL	A15-06-013	MA	Research re memo account issues		0.75
7/1/15	TL	A15-06-013	GP	Prep protest		0.25
7/1/15	TL	A15-06-013	MA	Prep response to m/memo account		1.75
7/2/15	TL	A15-06-013	GP	Prep protest		1.50
7/27/15	TL	A15-06-013	GP	Rev ALJ Ruling directing meet and confer		0.25
7/29/15	TL	A15-06-013	Coord	Ph call w/H.Morris (ORA) re coordinating positions for meet and confer ordered by ALJ		0.25
7/29/15	TL	A15-06-013	GP	Rev and analyze protests of SCGC, ORA, IS		0.75
7/29/15	TL	A15-06-013	Coord	Ph call w/N. Pederson (SCGC) re coordinating positions for meet and confer ordered by ALJ		0.75
7/29/15	TL	A15-06-013	MA	Rev and analyze SCGC response to motion and Sempra reply		0.25
7/30/15	TL	A15-06-013	GP	Meet and confer call ordered by ALJ		1.25
8/4/15	TL	A15-06-013	Coord	Post PHC strategy meeting w/N. Skinner, D. Gruen (ORA) re PSEP and opportunity for review in 2019 GRC		0.25
8/4/15	TL	A15-06-013	GP	Attend PHC		0.50
8/4/15	TL	A15-06-013	GP	Rev Sempra response to protests and prep for PHC		0.25

Date	9/19/2016 Atty 2:00 PM	Case	Task	Description	Hours	Time Spent
						Page 5
8/7/15	TL	A15-06-013	Sched	Discuss w/Bob strategy re scheduling of future PSEP applications		0.25
8/24/15	TL	A15-06-013	Sched	Research re big ticket Phase 1 issues to prep for meet and confer call w/Sempra		0.75
8/25/15	TL	A15-06-013	Sched	Meet and confer re orderly processes for Phase 2 and Phase 1 PSEP applications		1.50
8/27/15	TL	A15-06-013	Sched	Conf Call w/ORa (N.Skinner), SCGC(N. Pedersen), IS (E.Kahl) re rational process for multiple Ph 1 applications		1.00
9/1/15	TL	A15-06-013	Sched	Discuss w/BF options for a more rational process for Phase 1 applications		0.25
9/1/15	TL	A15-06-013	GP	Edit Sempra draft email to ALJ re request for clarification		0.25
9/3/15	TL	A15-06-013	Comp	Prep NOI		0.50
9/16/15	TL	A15-06-013	Sched	Discuss w/BF strategy for all-party call re Ph 1 reasonableness reviews		0.50
9/23/15	TL	A15-06-013	Sched	Ph call w/BF re report on call w/parties re modifying process for Ph 1 and Ph 2 applications		0.25
9/30/15	TL	A15-06-013	Sched	Rev and analyze Sempra Ph 1 and 2 applications scenarios (0.25) and discuss TURN response w/BF		0.50
10/16/15	TL	A15-06-013	Sched	Rev BF email re status of negotiations re procedure for Ph 1 and Ph 2 applications (0.25) and discuss w/BF strategy re same		0.75
10/19/15	TL	A15-06-013	Sched	Meet w/N. Pederson (SCGC), BF re strategy for procedure negotiations w/Sempra		0.25
10/22/15	TL	A15-06-013	CR	Meet w/BF re TURN position on negotiations w/Sempra and upfront recovery of PSEP costs		0.25
10/26/15	TL	A15-06-013	Sched	Discuss w/BF specifics of TURN proposal to ALJ		0.25
11/9/15	TL	A15-06-013	Sched	Rev TURN et al cmts re procedural schedule		0.25
12/2/15	TL	A15-06-013	GP	Rev ALJ Ruling re staff proposal for PSEP schedule/cost recovery		0.50
12/4/15	TL	A15-06-013	Sched/CR	Discuss initial reactions to staff proposal with SCGC, IS, ORA		0.25
12/7/15	TL	A15-06-013	Sched/CR	Conf call w/SCGC, ORA, IS re position at APM re ED proposal		1.00
12/7/15	TL	A15-06-013	Sched	Rev and analysis of ED proposal and pleadings re scheduling issues to prep for APM		1.50
12/7/15	TL	A15-06-013	Sched/CR	Review staff proposal, parties' counter-proposals to prep for APM		0.50
12/8/15	TL	A15-06-013	Sched/CR	Meet with ORA, SCGC, IS re clarifying, responding to ED proposal		0.50
12/8/15	TL	A15-06-013	CR	Meet with ORA, SCGC, IS re final coordination on up front recovery issue		0.25
12/9/15	TL	A15-06-013	Sched/CR	Discuss next steps re ED proposal w/Bob		0.25
12/10/15	TL	A15-06-013	Sett	Discuss potential settlement strategy re ED proposal w/BF		0.25

Date	9/19/2016 Atty 2:00 PM	Case	Task	Description	Hours	Time Spent
						Page 6
1/4/16	TL	A15-06-013	Sched/CR	Discuss w/BF strategy for responding to Staff proposal and potential joint comments		0.25
Total: TL						23.00
Grand Total						122.25

Attachment 3

Expense Detail

Date	Atty	Case	Task	Description	Amount
<u>Activity: \$Copies</u>					
7/2/15	HDG	A15-06-013	\$Copies	Copy of Response of TURN to the motion of Souther California Gas Company and San Fiego Gas & Electric Company to immediately establish the popeline safety enhancement plan memorandum accounts to send to the ALJ - 5 pages at \$0.10 per page	\$0.50
7/20/15	HDG	A15-06-013	\$Copies	Copy of Protest of TURN to send to the ALJ - 6 pages at \$0.10 per page	\$0.60
9/3/15	HDG	A15-06-013	\$Copies	Copy of Notice Of Intent To Claim Intervenor Compensation To Send To ALJ - 7 Pages at \$0.10 per page	\$0.70
11/9/15	HDG	A15-06-013	\$Copies	Copy of Comments of ORA, IS, SCGS, and TURN on the procedural schedule proposal of Southern California Gas Company and San Diego Gas & Electric Company to send to the ALJ - 27 pages at \$.10 per page	\$2.70
1/8/16	HDG	A15-06-013	\$Copies	Copy of Comments of TURN, IS, and SCGC on the Energy Division Staff Proposal For Scheduling and Interim Rate Recovery to send to the ALJ - 7 pages at \$0.10 per page	\$0.70
3/14/16	HDG	A15-06-013	\$Copies	Copy of Response of ORA, TURN, IS, and SCGC to the Reply Comments of the SoCal Gas Company and SDG&E on the Energy Division Staff Proposal for Scheduling and Interim Rate Recovery to send to the ALJ - 9 pages at \$0.10 per page	\$0.90
8/15/16	**	A15-06-013	\$Copies	Copy of Reply Comments of ORA and TURN on the Proposed Decision of ALJ Bushey send to the ALJ - 6 pages at \$0.10 per page	\$0.60
Total: \$Copies					\$6.70
<u>Activity: \$Phone</u>					
7/31/15	**	A15-06-013	\$Phone	7/31/2015 Phone Bill	\$1.89
Total: \$Phone					\$1.89
<u>Activity: \$Postage</u>					
7/2/15	HDG	A15-06-013	\$Postage	Postage to mail response of TURN to the motion of SoCal Gas and SDG&E company to immediately establish the pipeline safety enhancement plan memorandum accounts to the ALJ	\$1.20
7/20/15	HDG	A15-06-013	\$Postage	Postage to mail Protest of TURN to the ALJ	\$1.20
9/3/15	HDG	A15-06-013	\$Postage	Postage To Mail Notice Of Intent To Claim Intervenor Compensation To ALJ	\$1.20
11/9/15	HDG	A15-06-013	\$Postage	Postage to mail Comments of ORA, IS, SCGS, and TURN on the procedural schedule proposal of Southern California Gas Company and San Diego Gas & Electric Company to the AL	\$1.42
1/8/16	HDG	A15-06-013	\$Postage	Postage to mail Comments of TURN, IS, and SCGC on the Energy Division Staff Proposal For Scheduling and Interim Rate Recovery to the ALJ	\$1.20
4/14/16	HDG	A15-06-013	\$Postage	Postage to mail Response of ORA, TURN IS and SCGC to ALJ	\$1.20
8/15/16	**	A15-06-013	\$Postage	Postage to mail Reply Comments of ORA and TURN on the Proposed Decision of ALJ Bushey to the ALJ	\$1.15
Total: \$Postage					\$8.57

Date	Atty	Case	Task	Description	Amount
Grand Total					\$17.16

Attachment 4

TURN Hours Allocated by Issue

A.15-06-013
ATTORNEYS AND CONSULTANTS

A.15-06-013													Total	Total	
ATTORNEYS AND CONSULTANTS													Substantive	Compensation	
			GP	Coord	MA	Sched	CR	Sched/CR	PFM	Sett	PD	AL	Comp	Hours (not including comp)	(non-travel, non-comp)
	Billing Period	Hourly Rate													
Robert Finkelstein	2014	\$505							3.00					3.00	\$1,515.00
	2015	\$505	1.00			13.50	1.50	21.75		4.50				42.25	\$21,336.25
	2016	\$510	1.00			15.50	0.75	12.00			5.75	10.00	9.00	45.00	\$22,950.00
Thomas Long	2015	\$570	7.00	1.25	2.75	8.00	0.50	2.75		0.25			0.50	22.50	\$12,825.00
TOTAL			9.00	1.25	2.75	37.00	2.75	36.50	3.00	4.75	5.75	10.00	9.50	112.75	\$58,626.25